

Fleshman, J. Kenneth
Page 1 of 1

960 Placita de la Cotonia
Green Valley, AZ 85614
September 14, 2003

Mr. John M. McGee, Forest Supervisor
U.S. Forest Service
300 West congress, Tucson AZ 85701

Re: Proposed TEP Sahuarita-Nogales Transmission Line

Dear Sir,

When I moved to Arizona 19 years ago I chose to live in Green Valley, rather than Tucson, because of the many nearby mountain ranges, the so-called "Sky Islands". I am out in these mountains hiking 2 times a week. I know the Tumacacori and Atascosa mountains well. This area has been proposed for Wilderness status, which it deserves.

1 The current powerline proposal calls for 191 power poles of 140 feet height and 14 lines to pass through these two mountain ranges. This would be a major intrusion into this rugged, beautiful and nearly roadless and undisturbed area. It is unthinkable to consider the placement of these structures along Ruby Road at the base of Atascosa Peak and the officially designated historic fire lookout.

2 A case has been made for the need of a back up line for Nogales and Santa Cruz County. Only 20% of this line's capacity (100 Megawatts out of 500) is for Nogales. The remainder is for proposed export and sale to Mexico. This does not justify this destructive intrusion into the Coronado National Forest and I respectfully request that the United States Forest Service deny a permit for the passage of this transmission line.


J. Kenneth Fleshman

Comment No. 1

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project. The Atascosa Lookout is listed on the National Register of Historic Places for its architectural quality and its association with historical events that have made a significant contribution to the broad patterns of our history, including wildfire control efforts, Civilian Conservation Corps work, and the conservation movement. Assessments of the visual impact of the Western, Crossover and Central corridors all demonstrate that although the proposed transmission line would be visible from the lookout, the original fire detection function of the lookout house would not be compromised by the presence of the transmission line. The proposed project corridors would compromise neither the architecture, nor the historical associations of the lookout. None of the proposed corridors significantly impact the historical integrity of Atascosa Lookout.

Comment No. 2

TEP reached agreement with Citizens to provide up to 100 MW of transmission capacity from Tucson to Nogales, Arizona, and TEP anticipates using the remaining 400 MW of capability for transport of energy between the United States and Mexico (see Section 1.5, TEP's Proposed Project Capacity and Usage, of the Final EIS).

Chapter 3 describes the affected environment of the area and Chapter 4 evaluates the potential impacts of the proposed project, including potential impacts on the Tumacacori EMA of the Coronado National Forest.

F (Illegible), C.
Page 1 of 1

Comment No. 1

The Federal agencies note the commentator's opposition to the proposed project.

Comment No. 2

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Sections 3.3 and 4.3 discuss the existing biological resources, including the area of the Tumacacori Mountains and Sycamore Canyon, and analyze the potential impacts to these resources from the proposed project. Likewise, Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

10-9-03

Dr. Jerry Bell,

1 Please deny the proposed Tucson Electric
Power Sahuarita - Nogales transmission line DFIS.
I am a Tucson resident and active hiker,
fisherman, explorer, I've hiked the beautiful
Sycamore Canyon which is within the
Tumacacori Highlands. This area is the
2 largest wilderness area within Southern Arizona and
must be preserved. Allowing TEP to put a
transmission line 30 miles in this pristine area
is a crime against humanity. It will damage
wildlife, native vegetation, and the landscape and
the damage is PERMANENT.

1 You have a powerful voice in deciding whether
to preserve this beautiful area or not. The decision
to conserve this area or not is in your hands.
cont. Please make the right decision and vote against
allowing Tucson Electric Power the right to install
their transmission line in this scenic and natural
area.

Sincerely,
C. Hugel

Fonseca, Julia
Page 1 of 2

Julia Fonseca
315 E Elm St.
Tucson, AZ 85705

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85705

Dear Sue Kozacek-

Welcome to Coronado National Forest, and thanks for stepping up to serve as Forest Supervisor. I think the Coronado National Forest is one of the most interesting National Forests anywhere in the U.S. system.

Like you, I came from outside the region. I certainly hadn't expected to find mountains in the deserts, nor forests and flowing streams. Twenty-one years ago, I had not expected to fall in love with this land, but it happened anyway.

Unlike most people, I'm not really partial to the forests. I prefer the basins and bajadas and the larger, more integrated stream networks.

But southern Arizona's forests are really special. I'm sure you've seen a lot of the Catalinas, what with the fires, but don't assume the others are the same.

Comment No. 1

TEP would close 1.0 mi (1.6 km) of existing road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project on the Coronado National Forest, such that road density on the Coronado National Forest would not be affected.

Analysis of the proposed Forest Plan amendments is contained in Appendix H.

Fonseca, Julia

Page 2 of 2

I especially would like to draw your attention to the Payanta-Atascosa-Tumacacori area to the south. This area is dominated by volcanics, and biologically it has many, many different plant species which bespeak closer ties to the Mexican tropical legacy.

Some of this area is blessedly free of roads. Last year my husband + I made several trips to Peck Canyon. Though close to I-19, the part in National Forest is quite beautiful and wild. Nature has ^{re-}claimed portions of the road which passed through the canyon, and many unusual plants grow there, including a number of rare aquatic plants.

I think it would be a terrible mistake to put a powerline through any of the Tumacacori Ecosystem Management Area, or add to the burden of roads which already exist. I would hope that you would oppose amending the forest Plan to allow the powerline.

Long-term, I think you will see that we need more of what forests can provide -- clear water, spiritual renewal, acquaintance with our fellow travelers on earth -- and less of what cities must provide (roads, electricity), in the forests. Let the countries thrash out the issue outside the forest; let the affected communities come to terms with the solution. Please don't "solve" the real problem by providing an expedient but ultimately incredibly damaging solution by offering up this national treasure. Thanks! Julia

Fonseca, Julia
Page 1 of 1

JULIA FONSECA
315 E 56th
TUCSON, AZ 85705
1-480-292-1000

DR. JERRY PELL:
OFFICE OF FOSSIL ENERGY
U.S. DEPT OF ENERGY
WASHINGTON DC 20585

DEAR DR. PELL:

I AM PERSONALLY FAMILIAR WITH THE TUMACACORI MOUNTAINS AND SANTA CRUZ RIVER VALLEY OF SOUTHERN ARIZONA. THIS IS WHERE TUCSON ELECTRIC POWER WANTS TO RUN A NEW POWERLINE. WHILE I SEE A LOT WORSE THINGS GOING ON OUT HERE THAN POWERLINES, I THINK IT WOULD BE A BIG MISTAKE TO RUN THE POWERLINE THROUGH THE TUMACACORI MOUNTAINS. ~~THIS~~

1 THIS AREA IS NOT MUCH VISITED. THE CLEARING AND MAINTENANCE NEEDED FOR THE POWERLINE WOULD DESTROY A BIG AREA THROUGH CUMULATIVE + INDIRECT EFFECTS, MORE SO THAN THE ACTUAL FOOTPRINT OF THE TOWERS THEMSELVES. ROAD ACCESS AND EROSION CAUSED BY NEW ROADS, AND THE INVASIVE SPECIES (PEOPLE, PLANTS) THAT INEVITABLY FOLLOW WOULD MESS UP AN AREA THAT NEEDS GREATER, NOT LESSER, PROTECTION.

2 IN PARTICULAR, PECK CANYON HAS A WONDERFUL AQUATIC ECOSYSTEM WHICH WOULD BE DAMAGED BY THE POWERLINE. WHILE PECK HAS LOST ITS NATIVE FISH TO EXOTIC FISH INTRODUCTIONS, IT HAS POTENTIAL FOR HOSTING MANY UNUSUAL + RARE SPECIES THAT OCCUR IN THE SYCAMORE CANYON WATERSHED TO THE SOUTH. PECK JUST HADN'T RECEIVED MUCH ATTENTION BY KNOWLEDGEABLE SCIENTISTS LIKE SYCAMORE CANYON HAS. BOTH OF THESE AREAS NEED MORE PROTECTION, NOT MORE DISTURBANCE.

3 PLEASE CONSIDER A SMALLER LINE, A BURIED LINE, OR A NEW POWER PLANT. I FAVOR NEITHER THE WESTERN OR CROSSOVER ROUTES. A ROUTE AWAY FROM THE SANTA CRUZ RIPARIAN CORRIDOR IS ALSO NECESSARY.

Sincerely,
Julia Fonseca

Comment No. 1

Section 4.1.1, Land Use, of the Final EIS has been revised to clarify that although the Federal agencies use the term "footprint" to describe the area beneath each tower, there would be additional temporary and permanent land disturbance associated with the proposed project. Section 4.1.1 states that the area to be disturbed by access roads (both temporary roads for construction, and permanent roads for maintenance), transmission line tensioning and pulling sites, fiber-optic splicing sites, and laydown yards is addressed in Section 4.12, Transportation, and is not reflected in the structure site disturbance estimates in Table 4.1-1.

Direct and indirect effects of the proposed action, including the required road access, are evaluated in Chapter 4, Environmental Effects, for each resource area. Cumulative effects, such as road access from the proposed project in combination with road access from U.S. Border Patrol operations, are evaluated in Chapter 5.

Sections 3.6.2 and 4.6.2 present a description of the existing soils and analysis of the potential impacts to soils, including erosion impacts.

Sections 3.3 and 4.3 present a description of the existing biological resources and evaluation of potential impacts to biological resources, including invasive species impacts (Section 4.3.6) that could result from the proposed project.

Comment No. 2

Sections 3.3 and 4.3 present a description of the existing biological resources (including USFS Classified Riparian Areas in the Peck Canyon portion of the Crossover Corridor) and potential impacts to those biological resources from the proposed project.

Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their

Comment No. 3 (continued)

review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Because of the disadvantages and cost differential associated with burying transmission lines, this alternative is not evaluated in detail in the EIS. Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis, has been revised to indicate that the option of burying transmission lines was considered but eliminated from further analysis in the EIS.

Regarding the "Santa Cruz riparian corridor" cited by the commentor, the nearest corridor to the Santa Cruz River is the Central Corridor, which is approximately 0.5 mi (0.8 km) from the Santa Cruz River. The Santa Cruz River would not be crossed by any of the three proposed corridors, and none of the corridors are in the immediate vicinity of the Santa Cruz River.

Garty, Amanda
Page 1 of 1

Opinion of the Tucson-Electric Power Sahuarita-Nogales
Transmission line

From: Amanda Garty [SMTP:amandagarty@yahoo.com]
To: Pell, Jerry
Cc:

Subject: Opinion of the Tucson-Electric Power Sahuarita-Nogales
Transmission line
Sent: 10/14/2003 7:05 PM
Importance: Normal
Dear Dr. Jerry Pell,

1 | I'm writing to you regarding the Tucson-Electric Power Sahuarita-
Nogales Transmission line DEIS. I would like to express my concern
and opposition to the proposed project. The proposed 345 kV line
would slice through some of the most wild and ecologically sensitive
areas in southern Arizona without there being a clear "need" for the
project in Santa Cruz county.

2 | In addition, the Crossover and Western routes, and the 345 kV lines
are the most expensive options.

3 | Please consider alternatives, such as using a less expensive 115 kV
line that can be buried close to community boundaries and outside of
extremely fragile ecological areas.

This is a very important issue and I hope the final decision is given
serious and fair consideration.

Thank you for taking the time to consider my opinion.

Sincerely,

Amanda Garty
823 W. Birch Ave., Unit B
Flagstaff, AZ 86001

Comment No. 1

Sections 3.3 and 4.3 present a description of the existing biological resources and evaluation of potential impacts to biological resources.

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to ACC, Comment 1, and to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Comment No. 2

The construction costs of each of the three action alternatives (the Western, Central, and Crossover Corridors) would be roughly similar (see Section 4.5.1). Section 4.5 analyzes the potential socioeconomic impacts that could result from the proposed project based on a number of factors including the cost of the proposed project. Any additional analysis of the cost of the proposed project is outside the scope of the EIS.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. It is not for the agency to run the applicant's business.

Comment No. 3

A smaller transmission line in lieu of the proposed 345-kV line (e.g., 115-kV line) would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Garty, Amanda
Page 1 of 1

Forwarded by Susan K. Kozacek/R3/USDAFS on 10/16/2003 06:04 PM

Amanda Garty <amandagarty@yahoo.com>
10/14/2003 04:25 PM

To: skozacek@fs.fed.us
cc:
Subject: Comments on the TEP Sahuarita-Nogales Transmission line

Dear Sue Kozacek,

I am writing to you regarding the Tucson-Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendment. I strongly oppose the Preferred Route, specifically the Western and Crossover Routes. Both routes would slice through some of the most ecologically pristine and fragile areas in southern Arizona. I enjoy hiking and camping in the affected area. I would be gravely disappointed if the Forest Service allowed twenty miles of road development, and miles of ecologically disruptive power line development across the Tumacacori and Atascosa Mountains. In addition, the road density in the Tumacacori EMA is already above acceptable limits as stated in the currently enacted Forest Plan.

I strongly urge you to deny the special use permit to Tucson Electric Power.

Thank you for taking the time to hear my comments.

Sincerely,

Amanda Garty
823 W. Birch Ave. Unit B
Flagstaff, AZ. 86001
amandagarty@yahoo.com

Comment No. 1

Sections 3.3 and 4.3 present a description of the existing biological resources and evaluation of potential impacts to biological resources, including impacts from roads associated with the proposed project.

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities, including hiking and camping, and analyze the potential impacts to these resources from the proposed project, including impacts from roads associated with the proposed project.

TEP would close 1.0 mi (1.6 km) of existing road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project on the Coronado National Forest, such that road density on the Coronado National Forest would not be affected.

Comment No. 2

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest.

Comment No. 3

The commentor's opinion that the authorization should be denied is noted.

Garvin, Michael J.
Page 1 of 1

DEIS for Tucson Electric Power Powerline Proposal

From: mjgarvin@yahoo.com [SMTP:mjgarvin@yahoo.com]
To: Pell, Jerry
Cc:

Subject: DEIS for Tucson Electric Power Powerline Proposal
Sent: 10/10/2003 1:49 PM
Importance: Normal

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue, SW Washington, DC 20585

Dear Dr. Pell,

1 | Because Tucson Electric Power's proposed 345 kilovolt powerline
will cut through some of the last remote, wild spots in
Southeast Arizona, I ask you to withdraw the project's draft
Environmental Impact Statement.

The Tumacacori Highlands, over which the route is proposed, has
many roadless areas and abounds with rare wildlife, including
the occasional jaguar.

2 | While Santa Cruz County needs and deserves reliable electric
service, that service can be provided by a much smaller and less
obtrusive powerline than that which TEP has proposed. The draft
EIS does not address alternatives to the massive proposed
powerline, including a local power plant which would nullify the
need for the powerlines and may well provide cheaper electricity.

Sincerely,
Michael J. Garvin
1 Spring Hill Cir.
Sausalito, California 94965

Comment No. 1

Sections 3.1.2 and 4.1.2 discuss existing recreational settings and activities, and analyze potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to rare wildlife (see Section 4.3.3, Special Interest Species).

Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated

Comment No. 2 (continued)

in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Genser, Richard
Page 1 of 1

"Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"

From: RexGnsr@aol.com [SMTP:RexGnsr@aol.com]
To: Pell, Jerry
Cc:

Subject: "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"

Sent: 10/13/2003 6:38 PM
Importance: Normal

Dr. Jerry Pell
Office of Fossil Energy
U.S. Department of Energy
Washington D.C. 20585
Jerry.Pell@hq.doe.gov
FAX: 202-318-7761

"Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"

Sir:

1 | This project is a waste of money and time.
I suggest NO ACTION

2 | I do not support the proposed routes because they do not serve
Santa Cruz County's interests, as originally intended under ACC
order 62011. They are an unnecessary economic, environmental, and
3 | culture burden on Southern Arizona. Please consider withdrawing the
Draft Environmental Impact Statement and issuing an assessment that
properly analyzes real solutions to power needs in Santa Cruz County
that include a smaller power line and/or locally run power plant.

Respectfully,

Richard Genser
3221 E. Blossom Dancer Lane
Tucson, AZ 85718

Comment No. 1

The Federal agencies note the commentor's preference for the No Action Alternative.

Comment No. 2

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Gerganoff, Doris
Page 1 of 1

From: Doris Gerganoff [deegee5@earthlink.net]
Sent: Wednesday, October 01, 2003 11:30 AM
To: Pell, Jerry
Subject: Power Line Permit

1 | Dear Dr. Pell; Please add my name to the list of people
opposing the building of a 345,000 volt line, by TEP
(UniSource) through some of the most scenic areas of
Southern Arizona.

2 | This is a bad idea for a number of reasons and no reasons
have been presented, other than an economic benefit for TEP
(UniSource).

3 | I am a hiker and have had the pleasure of hiking in these
pristine areas and would love to think that they will be
available for my grandchildren to enjoy.

1 | I urge the DOE to recommend that a Presidential Permit from
cont. | the Department of Energy be denied.

Sincerely,

Doris Gerganoff

Comment No. 1

The Federal agencies note the commentor's opinion that the DOE should deny the Presidential Permit for the proposed project.

Comment No. 2

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...."

Comment No. 3

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities, including hiking, and analyze the potential impacts to these resources from the proposed project.

Green, Jonathan
Page 1 of 2

819 N. 10th Ave.
Tucson, AZ 85705
October 14, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

This letter is in reference to the Tucson Electric Power [TEP] Sahuarita-Nogales Transmission Line DEIS and needed Forest Plan amendments. TEP proposes to erect a 140 ft tall electric transmission line through one of the most remote wildlands of the Coronado National Forest, in the Tumacacori Highlands northwest of Nogales, AZ.

1 The preferred Western route is the longest, most expensive
and most environmentally damaging of all alternatives
considered. The Crossover route is nearly as terrible. Both
2 slice through the Tumacacori Proposed Wilderness Area. This
spectacular area is home to America's last jaguars as well as 9
3 other Endangered or Threatened species and 74 special status
species including Mexican spotted owls, southwestern willow
flycatchers, lesser long-nosed bats and Chiricahua leopard
frogs. The route comes within ½ mile of the existing Pajarita
Wilderness Area and Gooding Research Natural Area, and a
stretch of Sycamore Canyon eligible for Wild and Scenic
River status.

4 The Tumacacori, Pajarito and Atascosa Mountains are an
exceptional area for primitive recreation and wilderness
experience. I have enjoyed bird watching, hiking and camping
in the area and would be negatively affected by the
construction of a power line in the area. It is one of the few
places left in the Coronado NF where scenic vistas remain
unmarred by human structures on the landscape. The 191

Comment No. 1

The affected environment of the Western and Crossover Corridors is described in Chapter 3, and the potential environmental impacts (including socioeconomics impacts) are fully evaluated in Chapter 4.

Comment No. 2

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to endangered, threatened and special status species.

Comment No. 3

Section 3.1, Land Use, discusses the affected environment of the Pajarita Wilderness, which encompasses the Gooding Research Natural Area and the segment of Sycamore Canyon that is potentially eligible for designation as a Wild and Scenic River. The structure locations, construction areas, and proposed access roads for all three corridors would not enter into the Pajarita Wilderness. Potential impacts to these resources are addressed in the resource sections of Chapter 4, Environmental Effects.

Comment No. 4

Sections 3.1.2 and 4.1.2 present a description of existing recreational settings and activities, and analysis of potential impacts to recreation from the proposed project in the areas cited by the commentor. Section 4.1.2 specifically evaluates impacts to indicators such as remoteness and naturalness, both of which would have changes that are inconsistent with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.1.2 and 4.1.2 present a description of existing recreational settings and activities, and analysis of potential impacts to recreation from

Green, Jonathan
Page 2 of 2

4
cont. steel towers would reduce over 18,000 acres of wildlands from a Forest Service scenic rating of ‘High or Very High’ to “Moderate or Low.” A Forest Plan Amendment would only decrease the already dwindling supply of remote recreational experiences in Coronado NF and, for that reason alone, the power line is incompatible with the natural characteristics there.

5 TEP proposes to build over 20 new miles of road for the Preferred Route. Although they plan to close many of them, such closures are often unsuccessful. Even when closed, road scars in these fragile arid areas take generations to recover. Furthermore, power line corridors are notorious for channeling spread of invasive weeds, disrupting wildlife movement, and providing access to illegal off-road drivers and smugglers. Since the road density in the Tumacacori EMA is already above acceptable limits as set forth in the current Forest Plan, more

6 road building, even with associated closures would be in gross violation of the Forest Plan.

7 The Coronado National Forest is under no obligation to grant permission for the power line, which is an inappropriate use of our national forest. A 115 kV line would meet the requirements of both Santa Cruz County and Arizona Corporation Commission order 62011 without a new utility corridor or enormous towers. Furthermore, there is no “need” stated in the

8 DEIS for the 345 kV line by either the applicant (TEP) or agencies. TEP’s proposal for this oversized line results from their desire to connect with the Mexican power grid and serves neither the public good, Coronado NF nor the citizens of Santa Cruz County.

7
cont. For these reasons, all Special Use permits and Forest Plan amendments associated with this project must be denied.

Sincerely,
Jonathan Green

Comment No. 4 (continued)

the proposed project in the areas cited by the commentor. Section 4.1.2 specifically evaluates impacts to indicators such as remoteness and naturalness, both of which would have changes that are inconsistent with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project, including impacts to Scenic Integrity. Analysis of the proposed Forest Plan amendments is contained in Appendix H.

Comment No. 5

Any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate.

Sections 3.3 and 4.3 present analyses of the affected environment and potential impacts to biological resources, including wildlife and invasive species impacts. Section 4.3.2 states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts related to roads. Section 3.1.2 of the EIS states that there is off-highway vehicle use in the project area, and Section 4.1.2 analyzes the impacts of off-highway vehicle use as one of many recreational uses of the project area, including the Coronado National Forest.

Comment No. 6

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National

Comment No. 6

Forest. TEP would close 1.0 mi (1.6 km) of existing classified road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

Comment No. 7

As discussed in Section 1.2.2.2 of the Final EIS, the purpose and need for USFS action is to determine whether the proposed project development is appropriate within the Tumacacori EMA within the Coronado National Forest. If the proposed transmission line development is appropriate, USFS would work with TEP to decide the site-specific location for the line and support structures, mitigation measures and BMPs to be implemented to reduce environment effects, permit issuance terms and conditions, and pre- and post- construction reporting and monitoring.

Comment No. 8

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not require a 345-kV transmission line. However, TEP's stated purpose and need for the proposed project has a dual purpose to benefit both southern Arizona and Mexico.

A smaller transmission line in lieu of the proposed 345-kV line (e.g., 115-kV line) would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail (refer to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system located in Sonora, Mexico." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.